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**TECHNICAL DOCUMENT REVIEW
PENN ENVIRONMENTAL & REMEDIATION'S
RESPONSE TO EPA COMMENTS ON THE
REVISED REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN
FOR THE CINDER/SLAG FILL AREA
2301 RENAISSANCE BOULEVARD IN UPPER MERION TOWNSHIP,
MONTGOMERY COUNTY, PA**

Dynamac Corporation (Dynamac) performed a technical review of Penn Environmental & Remediation, Inc. (Penn E&R) Response (August 2001)) to EPA Comments (July 2001) on the draft report titled *Remedial Design/Remedial Action Work Plan for the Cinder/Slag Fill Area Located at 2301 Renaissance Boulevard in Upper Merion Township, Montgomery County, PA*, dated July 11, 2001.

GENERAL COMMENTS

- The change in approach (i.e., conducting a focused Risk-Assessment on post-excavation samples) increases the potential for the excavation to be opened for a longer time period. The work plan should include a plan for addressing significant amounts of accumulated water within the excavation as a result of weather conditions.
- Section 4.1.3 discusses the procedures to be employed to conduct the Focused Risk Assessment (FRA). Several issues were identified in this section:

This section references the National Academy of Sciences 1983 report "Risk Assessment in the Federal Government: Managing the Process" for outlining the procedures to be followed in conducting the FRA. EPA's risk assessment guidance document should be the basis for developing the FRA. The procedures to be referenced and followed are:

- USEPA. 1989. *Risk Assessment Guidance for Superfund (RAGS): Volume 1: Human Health Evaluation Manual (HHEM), Part A, Interim Final*. Office of Emergency and Remedial Response, Washington, DC. EPA/540/1-89/002.
- USEPA. 1998. *Risk Assessment Guidance for Superfund (RAGS): Volume 1: Human Health Evaluation Manual (HHEM), Part D, Standardized Planning, Reporting, and Review of Superfund Risk Assessments*. Office of Emergency and Remedial Response, Washington, DC. EPA/540/R-97033.

This section indicates that the only receptor to be evaluated is the adult construction worker. The impacts to groundwater from soil should also be evaluated.

Page 4-15, Analysis of Results. This section does not state whether a decision

about risk and risk calculation will be based on RME or CTE. They are generating both sets of numbers, but it is not clear what is proposed if one number shows risk and the other does not. Usually, in this case, potential risk is assumed and organ specific calculations are generated, but this should be stated.

Page 4-15, Analysis of Results. The text is confusing regarding carcinogenicity. The text uses the phrase "risk range" but does not identify a range in this section. It is assumed that the risk range referred to in this section refers to 1×10^{-4} to 1×10^{-6} cancer risk. This section indicates that for cancer risks less than 1×10^{-4} no further action will be required for the CSFA. This is not consistent with EPA policy. Generally, cancer risk greater than 1×10^{-4} requires further action, cancer risk less than 1×10^{-6} does not require further action. But cancer risk within the range between 1×10^{-4} and 1×10^{-6} requires further analysis, such as organ specific calculations. This issue should be addressed.

SPECIFIC COMMENTS TO PENN RESPONSES:

EPA Comment No. 2. This comment raises issues associated with the truck decontamination procedures. It references the need for a Erosion and Sedimentation Plan. There are several discrepancies between the Work Plan text and the text found within the E&S Plan as well as concerns with the E&S Plan. The following issues are noted:

The Work Plan text on page 4-4 indicates that geotextile fabric will be placed above and below the 12 mil plastic liner, there is no mention of this in the E&S Plan,

The Work Plan indicates the use of plywood to catch any contaminated material spilling from the trucks during loading. No mention of the plywood is found in the E&S Plan.

The E&S Plan on Page 3-7 indicates that all trucks which leave the CSFA will be required to drive onto the decontamination pad. While this is accurate, the Plan should state that all trucks hauling waste, whether they have actually entered the CSFA or not, will be required to drive onto the decontamination pad for inspection.

The E&S Plan states that water which accumulates in the excavation will be pumped to an area southwest of the CSFA and allowed to infiltrate into the ground surface. They cite previous approval from EPA during other such excavations. This will be a relatively large excavation, so the potential for large quantities of water to accumulate are high, especially given that the determination of whether the excavation is clean or not is going to be performed post removal (i.e. Focused Risk Assessment) which may lead to the excavation remaining open longer. By potentially discharging large quantities of water (which may be contaminated) runs the risk of contaminating soil in an area not previously

contaminated. It is recommended that an alternate means of addressing accumulated water be designed.

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EPA Comment No. 4. This comment requested an increased level of confirmation samples. The response indicated that the frequency was increased resulting in a total of 33 bottom samples and 15 side-wall samples. Figure 4-3 indicates 33 bottom sample locations, but only 14 side-wall locations. This discrepancy should be clarified.

EPA Comment No. 5. EPA requested incorporation of their split sample data into the work plan. Penn E&R incorporated the data, specifically into Table 2-2, and evaluated that data in Sections 2.2 *Remedial Design Site Characterization Activities* and 2.3 *Compounds of Concern in the CSFA*. Several omissions were made with respect to identification of contaminants exceeding screening criteria and identification of COCs. The following EPA split sample data (Table 2-2) had contaminants which exceeded either PADEP or EPA screening criteria but were not identified as such. These include:

- Anthracene (exceeds EPA SSL and PADEP NRSG MSC)
- Fluoranthene (exceeds PADEP NRSG MSC)
- Pyrene (exceeds EPA SSL and PADEP NRSG MSC)
- Mercury (exceeds PADEP NRSG MSC)
- Zinc (exceeds PADEP NRSG MSC)

Additionally, the work plan presents an argument for elimination of Arochlor - 1254 and dieldrin as COCs. The primary reason is the frequency of detection (i.e., 1 detection in 7 samples). The frequency of detection does not appear to be low enough to base the elimination of a contaminant, given the few samples collected and the heterogeneity of the waste deposited (municipal/household trash, bottles, slag, WAL, etc.)

Therefore, these contaminants should be included as COCs. There are numerous references in the document in addition to Sections 2.2 and 2.3. All appropriate sections throughout the document should be revised to reflect this change.